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ACTIONColorado Department
of Public Health
and Environment

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July 19, 2002

DIST.	LTR	ENC
BOGNAR, E.	X	X
DECK, C. A.	X	X
DEGENHART, K.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	X
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J.		
ISOM, J. H.		
LONG, J. W.		
MARTINEZ, L. A.	X	X
MCLAUGHLIN, J.	X	X
NORTH, K.	X	X
PARKER, A. M.		
POWERS, K.		
RHOADES, D. W.		
RODGERS, A. D.		
SCOTT, G. K.		
SHELTON, D. C.	X	X
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.		
VOORHEIS, G. M.		
WILLIAMS, J. L.		
BUTLER, L.	X	X

Mr. Joe Legare

Assistant Administrator for Environment and Infrastructure
U.S. Department of Energy-RFFO
10808 Highway 93, Unit A
Golden CO 80401-8200

RE: Draft ER RSOP Notification #02-08, IHSS Group 000-1 (Solar Evaporation Pond Area of Concern)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment and the Environmental Protection Agency have reviewed the above-referenced ER RSOP Notification and have attached comments to this correspondence. This Notification has been reviewed without two important pieces of information - results of the Sampling and Analysis Plan for this IHSS Group and the results of the human health risk assessment, which will determine specific soil removal locations. The agencies expect to approve this Notification once the attached comments are resolved and the specific removal locations are provided.

If you have any questions concerning these comments, please contact Carl Spreng (CDPHE) at 303-692-3358, Elizabeth Pottorff (CDPHE) at 303-692-3429, or Jean MacKenzie (EPA) at 303-312-6258.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator
Colorado Department of Public
Health and Environment

Tim Rehder
Rocky Flats Project Manager
Environmental Protection Agency

COR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

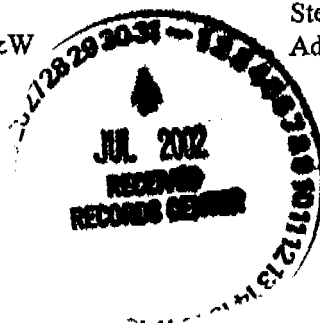
Reviewed for Addressee
Corres. Control RFP7/31/02
Date

By

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DOE ORDER #

5400-1

cc: Scott Surovchak, DOE
Dave Shelton, K-H
Lane Butler, K-H
Mark Sattelberg, USF&WDan Miller, AGO
Susan Chaki, CDPHE
Steve Tarlton, CDPHE-RFOU
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ADMIN RECORD

1101-A-000272

*****DRAFT*****

Comments by
Colorado Department of Public Health & Environment and
the Environmental Protection Agency
on

Draft ER RSOP Notification #02-08 – IHSS Group 000-1 (Solar Evaporation Ponds)
June 2002

1. Table 1 (FY02 Potential Remediation Areas) - This table only specifies that the concrete from the Unit 21 and 48 slabs will be LLMW. It seems that wastes from at least some of the other sources on this table will be LLMW since they came into contact with wastes from the RCRA-regulated Solar Ponds, which managed listed hazardous waste. Table 1 should also include the OPWL within the SEP AOC.
2. Section 2.2 - The items listed as Project Conditions within the SEP AOC should include:
 - PAC 900-1310 (soil contaminated by ITS water spill);
 - New Process Waste Lines;
 - Leak detection drains;
 - Solar Evaporation Ponds with liners, berms, and underlying contaminated soil;
 - Solar Ponds Plume;
 - Interceptor Trench System;
 - Solar Ponds Plume collection and treatment system.
3. Section 2.3 - The action of pushing in the berms around the solar ponds and re-contouring the area is integral to the project and should be added to the list of objectives in the remediation plan.
4. Section 2.3 - The term "disrupt" is used in 3 of the remedial objectives; its specific meaning should be clarified. The locations of the "disruption" activities and the method(s) that will be used to disrupt potential migration pathways needs to be describe in detail.
5. Section 2.3 and Figure 2 - The boundaries of the proposed work need to be better defined. It is unclear from the remediation plan exactly what sections of OPWL will be removed. Maps, drawings, or photographs need to be provided to show where piping will be cut and to define the boundaries of the components of the units to be removed. This document should state that this action will ensure that all portions of OPWL less than 3 feet below the re-contoured ground surface will be removed. This section also needs to describe what is known regarding the current status of all the pipelines in the Notification as to whether or not they are expected to contain liquids. Additionally, the Notification needs to describe measures that will be employed to drain any liquids in the pipelines, to prevent the release of any residual liquids and to contain, characterize and subsequently manage the liquids. The Notification needs to describe how the end points of remaining

pipings will be physically identified (e.g., surveyed or physically marked with tags, signs, etc.) for inspection purposes and future closure activities.

6. A commitment to follow the protocols for confirmation sampling in the IASAP and a general description of the number and location of in-process and confirmation samples should be included.
7. Sections 2.3 and 2.5 - Both sections state: "Remove soil hot spots as agreed to through the consultative process." This hot spot removal effort is apparently different than the other soil removals listed and will presumably be based on the forward risk assessment that has not been included with this Notification. When a risk assessment process is applied to RCRA closure units, alternative closure requirements found in 6 CCR 1007-3 §265.110(d) can be used. The flexibility in those requirements has been interpreted and applied by CDPHE to allow closure requirements based on non-residential exposure assumptions at a 10^{-6} risk level. In addition, all remedial decisions based on restricted-uses must create or commit to create an environmental covenant with the State.
8. Sections 2.3 and 2.5 - Have remedial actions been considered which could reduce contamination at the source of the Solar Ponds Plume in order to reduce the long-term stewardship obligations of the plume treatment system?
9. Section 2.4 -The purpose of the PAM mentioned in Section 2.4 and its relationship to this Notification should be explained.
10. Section 2.5 - In order to properly characterize concrete for recycling purposes, total analysis of hazardous constituents will be necessary.
11. Section 2.5 - The remedial action objectives could include:
 4. Provide a remedy that is consistent with the intended future use of the site (wildlife refuge); and
 5. Provide a remedy that will ensure protection of surface water via groundwater.
12. Section 2.4 - The project-specific monitoring should be summarized in Section 2.7.
13. Section 2.8 - The Solar Evaporation Ponds themselves and all ancillary equipment and structures comprise a RCRA unit and should be included in the description of RCRA Units. Any portion of the unit that came into contact with the listed hazardous/mixed waste managed in the Solar Evaporation Pond will either need to be adequately decontaminated in accordance with the Colorado Hazardous Waste Regulations or will need to be managed as hazardous/mixed waste. Closure of the Solar Ponds RCRA Interim Status units should be described in Section 2.8 in accordance with the ER RSOP and RFCA Attachment 10.
14. Section 2.8 - The discussion of RCRA waste disposition should provide more detail. The notification needs to either describe the hazardous waste codes that will be assigned to the

hazardous/mixed wastes that will be generated, or describe the process for properly characterizing such wastes.

15. The ER RSOP requires that a project schedule be included with the notification.
16. Asphalt and other impermeable surfaces will be removed throughout the site, therefore, the rationale for leaving the liners in place should be included. The increased infiltration as a result of removing or perforating the liners would increase the effectiveness of the Solar Ponds Plume treatment system.